

Mayor's Transport Strategy: Integrated Impact Assessment Post Adoption Statement

Report for Transport for London

In Association With ERM and Future Inclusion

May 2010



| | | |
|----------|---|-----------|
| 1 | Introduction | 1 |
| 1.1 | The Revised Mayor's Transport Strategy (MTS) | 1 |
| 1.2 | The Integrated Impact Assessment (IIA) of the MTS | 1 |
| 1.3 | The Purpose of the Post Adoption Statement (PAS) | 2 |
| 1.4 | The Structure of the PAS | 4 |
| 2 | How Environmental and Wider Sustainability Considerations Have Been Integrated into the Revised MTS & How the IIA Report (Incorporating the SEA Environmental Report), Has Been Taken into Account | 5 |
| 2.1 | The IIA Process | 5 |
| 2.2 | How Environmental and Wider Sustainability Considerations have been integrated into the MTS | 6 |
| 2.3 | How the IIA Report Has Been Taken into Account | 10 |
| 3 | Opinions Expressed in Response to Consultation & How These Have Been Taken Into Account | 12 |
| 3.1 | Overview of Consultation Responses on the Draft Revised MTS | 12 |
| 3.2 | Overview of Consultation Responses on the IIA Report | 12 |
| 3.3 | Environment Agency | 13 |
| 3.4 | Natural England | 13 |
| 3.5 | English Heritage | 13 |
| 3.6 | Inclusion London/Friends of the Earth | 14 |
| 3.7 | ClientEarth | 15 |
| 3.8 | London Sustainable Development Commission | 16 |
| 4 | Reasons for Choosing the MTS as Adopted in the Light of Other Reasonable Alternatives Dealt With | 17 |
| 4.1 | Development of the Revised MTS: Strategy Alternatives Considered | 17 |
| 4.2 | Reasons for Adoption of the MTS | 18 |
| 5 | The Measures That Are To Be Taken to Monitor the Significant Environmental and Wider Sustainability Effects of the Implementation of the MTS | 19 |
| 5.1 | Summary of Monitoring | 19 |

1 Introduction

This document comprises the Post Adoption Statement (PAS) required by Regulation 16 (1) & (2) of the Environmental Assessment of Plans and Programmes Regulations 2004, otherwise known as the SEA Regulations. Regulation 16 sets out the requirements for the 'Post-Adoption Procedures' to be undertaken following the adoption of the revised Mayor's Transport Strategy (MTS). They include the publication of the revised MTS and its accompanying Integrated Impact Assessment (IIA) Report, including the Environmental Report, and this PAS.

1.1 The Revised Mayor's Transport Strategy (MTS)

- 1.1.1 In accordance with his statutory duty under the Greater London Authority (GLA) Act 1999, the Mayor of London has prepared a revised Mayor's Transport Strategy (MTS) that sets out his policies and proposals for transport in Greater London in the period to 2031. The Mayor delegated authority to Transport for London (TfL) to prepare the revisions to the MTS on his behalf.
- 1.1.2 The MTS sets out the Mayor's vision for transport in London to 2031, and describes how TfL and its partners, including Government and the London boroughs, will deliver that vision. The MTS describes how the Mayor will develop and implement policies and proposals for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services, to, from and within Greater London. The MTS is consistent with other Mayoral strategies, including the emerging revised London Plan (LP), the Mayor's vision for the spatial development of Greater London, and the revised Mayor's Economic Development Strategy (EDS).
- 1.1.3 The Revised MTS is available from: <http://www.london.gov.uk/priorities/transport/vision>.

1.2 The Integrated Impact Assessment (IIA) of the MTS

- 1.2.1 The preparation of the revisions to the MTS has been subject to procedural and legal requirements including the SEA Regulations, necessitating assessment of how the strategy will affect people, places and environmental conditions in Greater London. To fulfil these requirements, TfL undertook the IIA. The IIA comprises an integrated assessment of the likely significant effects of the Draft Revised MTS, incorporating the following assessments:
- Strategic Environmental Assessment (SEA)¹;
 - Strategic Health Impact Assessment (HIA)²;
 - Equality Impact Assessment (EqIA)³;

¹ The SEA Directive: 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment.

Environmental Assessment of Plans and Programmes Regulations 2004, Statutory Instrument 2004 No. 1633

² A short guide to Health Impact Assessment – Informing Healthy Decisions (NHS Executive London)

³ GLA and TfL document (c.2004) "Equality Impacts Assessments - How to do them", TfL's (November 2006) "Full Impact Assessment Guide for Managers" and the Department of Health's 'Equality impact assessment: summary tool and guidance for policy makers'.
http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@dh/@en/documents/digitalasset/dh_090395.pdf



1 Introduction

- Assessment of Economic Impacts (AEI); and
- Habitats Regulation Assessment screening exercise (HRA screening)⁴.

1.2.2 The IIA also includes an assessment of likely significant effects of the MTS on community safety (as required under s.17 of the Crime and Disorder Act 1998 (as amended)) and on children and young people.

1.2.3 In undertaking the IIA, the intention has been to ensure that commonalities, inter-related issues and synergies between the above assessments and their outputs were identified in a systematic manner, and used to inform the Revised MTS development process.

1.2.4 The IIA process and methodology are described in the IIA Report⁵ which accompanied the publication of the Draft Revised MTS. The report was made available for public and stakeholder consultation in the period between 12th October 2009 – 12th January 2010. The IIA Report and the Draft Revised MTS are available from: <http://www.tfl.gov.uk/corporate/13980.aspx>.

1.3 The Purpose of the Post Adoption Statement (PAS)

1.3.1 The preparation of a PAS is a requirement of the SEA Regulations. Regulation 16(1) and (2) requires that a statement is prepared and published following the adoption of the MTS and the publication of the IIA Report, containing the following particulars set out in Regulation 16(4):

- how environmental considerations have been integrated into the MTS;
- how the environmental report has been taken into account;
- how opinions expressed by consultees in response to the invitation referred to in Regulation 13(2)(d)⁶; and
- action taken by the responsible authority in accordance with Regulation 13(4)⁷, have been taken into account; how the results of any consultations entered under Regulation 14(4)⁸ have been taken into account;

⁴ Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora & Conservation of Habitats and Species Regulations & The Conservation (Natural Habitats, &c.) Regulations 1994 (subsequently amended by the 2010 Regulations).

⁵ Draft Revised Mayor's Transport Strategy: Integrated Impact Assessment Report for Transport for London, MVA in Association With ERM and Future Inclusion, October 2009

⁶ Regulation 13 (2) (d) states 'invite the consultation bodies and the public consultees to express their opinion on the relevant documents, specifying the address to which, and the period within which, opinions must be sent.

⁷ Regulation 13(4) states 'The responsible authority shall keep a copy of the relevant documents available at its principal office for inspection by the public at all reasonable times and free of charge'.

⁸ Regulation 14 (4) states 'Where the Secretary of State receives from a Member State an indication that it wishes to enter into consultations before the adoption, or submission to the legislative procedure for adoption, of a plan or programme forwarded to it in accordance with paragraph (3), the Secretary of State shall –

- agree with the Member State— (i) detailed arrangements to ensure that the Authorities referred to in paragraph 3 of Article 6 of the Environmental Assessment of Plans and Programmes Directive and the public referred to in paragraph 4 of that Article in the Member State likely to be significantly affected are informed and given an opportunity to forward their opinion within a reasonable time; and (ii) a reasonable time for the duration of the consultations;
- enter into consultations with the Member State concerning – (i) the likely transboundary environmental effects of implementing the plan or programme; and (ii) the measures envisaged to reduce or eliminate such effects;

- the reasons for choosing the MTS as adopted, in the light of the other reasonable alternatives dealt with; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the MTS.

1.3.2 Table 1.1 below sets out where these regulatory requirements are addressed in this PAS.

Table 1.1 Where the SEA Regulations Requirements are addressed in the PAS

| SEA Regulations Requirement | Where This is Addressed in the PAS |
|--|---|
| 16. 4 (a) how environmental considerations have been integrated into the plan or programme; | Chapter 2 How environmental and wider sustainability considerations (social and economic) reported in the IIA Report have been integrated into the development of the MTS. |
| 16.4 (b) how the environmental report has been taken into account; | Chapter 2 How the IIA Report has been taken into account in informing the contents of the MTS. |
| 16.4 (c) how opinions expressed in response to - (i) the invitation referred to in Regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; | Chapter 3 How the consultation undertaken on both the IIA Report and the Draft Revised MTS and the responses to the consultation received, have been taken into account in preparing the MTS. This Regulation deals with situations where the plan or programme is likely to give rise to significant trans-boundary effects between Member States. This is not applicable as no significant trans-boundary effects arose affecting the preparation of the MTS. |
| 16.4 (d) how the results of any consultations entered under regulation 14(4) have been taken into account; | |
| 16.4 (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and | Chapter 4 The alternatives considered in developing the MTS and the reasons for choosing the MTS in the light of the alternatives. |
| 16.5 (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. | Chapter 5 The measures that are to be taken to monitor the significant environmental and wider sustainability effects of the implementation of the MTS. |

(c) Where he is not the responsible authority, direct that authority that it shall not adopt the plan or programme, or submit it to the legislative procedure for adoption, until the consultations with the Member State have been concluded.

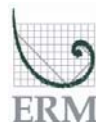


1 Introduction

- 1.3.3 Consistent with the approach of the IIA, this PAS addresses not only environmental matters in accordance with the SEA Regulations, but all aspects of sustainability (including environmental, social and economic matters) covered by the IIA.
- 1.3.4 The PAS draws upon information supplied by TfL in the Report to the Mayor on the Public and Stakeholder Consultation on the Draft Revised MTS (RTM). The RTM summarises the public and wider stakeholder responses received in response to consultation on the Draft Revised MTS and how TfL has responded to the issues raised including changes made to the MTS as adopted. The RTM is available from: <http://www.london.gov.uk/priorities/transport/vision>.

1.4 The Structure of the PAS

- 1.4.1 The PAS is structured in accordance with the requirements of the SEA Regulations, as set out in Table 1.1 above.



future inclusion

2 How Environmental and Wider Sustainability Considerations Have Been Integrated into the Revised MTS & How the IIA Report (Incorporating the SEA Environmental Report), Has Been Taken into Account

In accordance with the requirements of Regulation 16.4 (a) and (b), this Chapter sets out how environmental considerations and wider considerations of sustainability have been integrated into the development of the MTS; and how the principal output of the IIA, the IIA Report (incorporating the SEA Environmental Report), has been taken into account in determining the content of the MTS.

2.1 The IIA Process

2.1.1 The IIA process began in autumn 2008 with the development of a Scoping Report which set out the scope and nature of the process and its role in the development of the revisions to the MTS. The Scoping Report contained a draft assessment framework for evaluating the impacts of the draft revisions and their potential to achieve the following objectives:

- To contribute to, and facilitate, more sustainable and efficient economic progress within London;
- To enhance equality and actively mitigate the barriers to this;
- To contribute to enhanced health and wellbeing for all within London;
- To promote safety and security for all working, travelling and using London transport services and facilities;
- To contribute to the mitigation of and adaptation to climate change; and
- To protect and enhance the physical, historic, archaeological and socio-cultural environment and public realm.

2.1.2 The Scoping Report was published in April 2009 and disseminated to the three SEA statutory consultees (English Heritage, the Environment Agency and Natural England) for consultation. It was consulted upon from 25th February 2009 to 1st April 2009.

2.1.3 The responses to the consultation process on the Scoping Report were included in Annex A of the IIA Report that also included how such responses were addressed in the Draft Revised MTS and the IIA Report. As a result of the Scoping consultation exercise, the following actions were taken:

- Minor changes were made to the IIA Framework;
- Additional information was included in the baseline data supporting the IIA Report (Appendix B);
- Key issues were noted for consideration in the assessment of the Draft Revised MTS;
- The importance of considering alternatives within the assessment was reiterated.



2 How Environmental and Wider Sustainability Considerations Have Been Integrated into the Revised MTS & How the IIA Report (Incorporating the SEA Environmental Report), Has Been Taken into Account

- 2.1.4 As a result of the Scoping exercise, the IIA Framework was finalised, as set out in Chapter 5 of the IIA Report.
- 2.1.5 The assessment of the possible strategic transport policy options to be considered in developing the Draft Revised MTS was an iterative process using the IIA Framework that commenced in summer 2009. The options are described in Chapter 4.

2.2 How Environmental and Wider Sustainability Considerations have been integrated into the MTS

- 2.2.1 In accordance with Government guidance⁹, the following provides a summary of how relevant environmental and wider sustainability considerations identified in the Scoping exercise have been integrated into the MTS.
- 2.2.2 As seen in the Scoping Report, from the outset of the IIA process, there was a clear focus on environmental and wider sustainability considerations in the drafting of the MTS; this being shaped in the MTS through the identification of six strategic transport goals in line with the Department of Transport's (DfT) 'Delivering a Sustainable Transport System' (DaSTS) objectives¹⁰. These goals, which are set out below, helped to ensure that environmental and wider sustainability considerations were integral to the preparation of the Strategy. They are:

- Support economic development and population growth
- Enhance the quality of life for all Londoners
- Improve the safety and security of all Londoners
- Improve transport opportunities for all Londoners
- Reduce transport's contribution to climate change and improve its resilience
- Support delivery of the London 2012 Olympic and Paralympic Games and its legacy

- 2.2.3 Within the framework of these goals, the MTS drafting team developed policies and proposals designed to achieve the objectives stated within the six goals.
- 2.2.4 In parallel with the development of policies and proposals, the IIA Framework was applied to test the environmental and wider sustainability of emerging policies and proposals. To facilitate this exercise, there was close and ongoing communication between the TfL MTS drafting team and the IIA consultancy team on sustainability matters.
- 2.2.5 The main interrelationships between the IIA and the preparation of the Draft Revised MTS were:

- Early engagement (pre Scoping Report) between the MTS drafting and IIA teams to determine the issues and challenges for progressing sustainable transport planning and development in Greater London;

⁹ Office of the Deputy Prime Minister (ODPM) and Devolved Administrations' (September 2005), A Practical Guide to the Strategic Environmental Assessment Directive.

¹⁰ Delivering a Sustainable Transport System (DaSTS) <http://www.dft.gov.uk/about/strategy/transportstrategy/dasts/>

2 How Environmental and Wider Sustainability Considerations Have Been Integrated into the Revised MTS & How the IIA Report (Incorporating the SEA Environmental Report), Has Been Taken into Account

- Workshops undertaken jointly between the MTS drafting team and the IIA team to provide feedback and review on the development of emerging policies and proposals;
- Provision of written feedback by the IIA team on iterations of the Draft Revised MTS by MTS drafting 'Working Groups' and a preliminary assessment of the Draft Revised MTS;
- Ongoing review of iterations, pre and post consultation, of proposed sections of the Draft Revised MTS and meetings between relevant policy drafters and the IIA team; and
- IIA personnel working in-house with the MTS team to advise on the drafting of the Draft Revised MTS and ensure ongoing liaison between the MTS drafting and IIA teams.

2.2.6 Figure 2.1 illustrates the interactions and information exchanges between the IIA and MTS teams over the timescale (2009) of the preparation of the Draft Revised MTS.

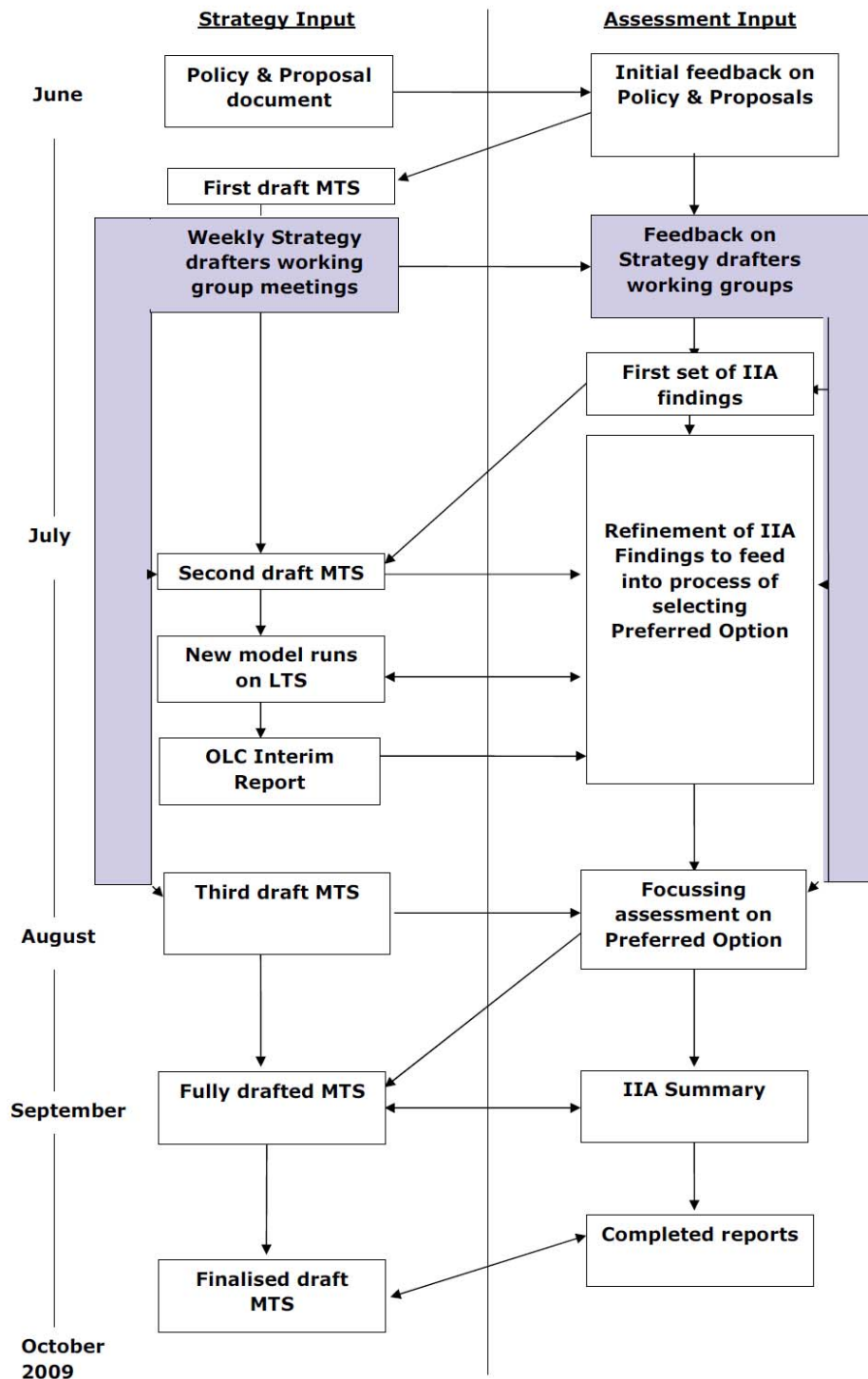


Figure 2.1 Interactions between the MTS and IIA teams (2009)

Please note: OLC is the Outer London Commission and LTS denotes the London Transportation Studies Model. Completed Reports are those of the IIA Scoping Report, the IIA Report and its Non-Technical Summary and the HRA Screening Report.

2.2.7 Through preliminary assessment, constructive challenge and ongoing review of the iterations of the emerging policies and proposals of the Draft Revised MTS, of the nature outlined in Figure 2.1, relevant environmental and wider sustainability policy considerations were identified and integrated



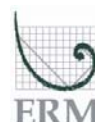
2 How Environmental and Wider Sustainability Considerations Have Been Integrated into the Revised MTS & How the IIA Report (Incorporating the SEA Environmental Report), Has Been Taken into Account

into the Draft Revised MTS as a result of the IIA process. Examples of this process of interaction between the IIA and the MTS drafting team are set out below.

- Explicit recognition of the contribution policies and proposals were making to sustainability aims. For example: explicitly recognising the benefit which policies and proposals could make to enhance the health and wellbeing of Londoners (Section 4.3.6).
- Fully elaborating upon issues of specific relevance to stakeholders. For example: recognising the importance of perception in influencing health and wellbeing, in particular, in relation to crime and fear of crime (Section 4.4).
- Ensuring sections took into account relevant considerations. For example: explicitly addressing the breadth of the built environment, taking into account the historic and archaeological environment and the contribution this makes to London (Section 4.3.3).
- Informing ongoing development of sustainable policies and proposals. For example: ensuring policies and proposals aimed at addressing the challenge of climatic change would address both mitigation and adaptation (emergent drafts of policies and proposals in Section 5.20).
- Recognising the particular requirements of important environmental assets. For example: explicitly recognising in the MTS the need to protect Natura 2000 sites (Sections 4.3.3 and 7.3).
- Addressing the pivotal role of implementation in delivering sustainability. Examples are:
 - Explicitly recognising in the MTS the importance of environmental and wider sustainability in planning and assessing projects occurring in the future as a result of the MTS (Chapter 7).
 - Making clear which stakeholders would be involved in delivering upon commitments identified in policies and proposals (Chapter 7).
 - Reasserting the importance of how the MTS would be implemented as an opportunity to further enhance the environmental and wider sustainability benefits which could accrue (Section 4.3.3 and Chapter 7).

2.2.8 The IIA Report (Chapter 6 and Appendix D) assessed the overall effect of policies and proposals within the Draft Revised MTS against the range of sustainability objectives included in the IIA Framework. For example, policies and proposals which principally contributed to the objective of sustainable and efficient economic progress were also assessed in terms of their contribution, or otherwise, to meeting objectives for equality, health and wellbeing, the environment and climate change. In this way, the IIA identified where the Draft Revised MTS, in contributing to the achievement of one sustainability objective, could also contribute in an integrated way to achieving other sustainability objectives.

2.2.9 In addition, where policies and proposals which principally contributed to one sustainability objective could potentially conflict with another, this was identified. For example, policies aimed at encouraging greater walking and cycling were identified by the IIA as having the potential to increase the risk of collisions for pedestrians and cyclists if not appropriately managed through the safety measures in the MTS (IIA Report, Table 6.1).



2 How Environmental and Wider Sustainability Considerations Have Been Integrated into the Revised MTS & How the IIA Report (Incorporating the SEA Environmental Report), Has Been Taken into Account

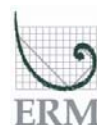
2.3 How the IIA Report Has Been Taken into Account

- 2.3.1 The IIA process described above provided the means by which the drafting of the MTS was positively influenced and shaped by considerations of environmental and wider sustainability. The IIA Report (Chapter 6) reports the outcome of this process, setting out for the public, stakeholders and statutory consultee bodies the findings of the assessment of the Draft Revised MTS.
- 2.3.2 The IIA Report (Chapter 6) concluded that the policies and proposals in the Draft Revised MTS would make a positive contribution in relation to the IIA's Assessment Framework, as set out below. No changes were considered necessary as to the statement of the overall assessment findings as a result of the changes made to the MTS following opinions expressed during the consultation on the Draft Revised MTS. No changes were also considered necessary as to the statement of the overall assessment findings as a result of the updated information contained in the MTS, on matters such as emissions reductions and predicted population trends.

| How the Draft Revised MTS Performs | Overall Performance of Draft Revised MTS against Primary Assessment Objectives of the IIA |
|------------------------------------|---|
| ✓ | Primary Objective A - To contribute to and facilitate sustainable and efficient economic progress within London Overall significance of impact: Positive and of minor to moderate magnitude. |
| ✓✓ | Primary Objective B - To enhance equality and actively mitigate the barriers to achieving equality and inclusion Overall significance of impacts: Positive and of moderate to major magnitude. |
| ✓ | Primary Objective C - To contribute to enhanced health and wellbeing for all within London Overall significance of impacts: Positive and of minor to moderate magnitude. |
| ✓ | Primary Objective D - To promote safety and security for all working, travelling and using London transport services and facilities Overall significance of impacts: Positive and of minor to moderate magnitude. |
| ✓ | Primary Objective E - To contribute to the mitigation of and adaptation to climate change Overall significance of impacts: Positive and of minor to moderate magnitude. |
| ✓ | Primary Objective F - To protect and enhance the physical, historical, archaeological and socio-cultural environment and public realm Overall significance of impacts: Positive and of minor to moderate magnitude. |

2 How Environmental and Wider Sustainability Considerations Have Been Integrated into the Revised MTS & How the IIA Report (Incorporating the SEA Environmental Report), Has Been Taken into Account

- 2.3.3 The IIA Report also took into account the findings of the HRA Screening. These findings indicated that HRA screening assessment and, if necessary, Appropriate Assessment (AA) should be undertaken at the level of lower tier plans such as Local Implementation plans (LIPS) by the respective competent authorities. The MTS explicitly recognised this in Section 4.3.3 'Enhancing the Built and Natural Environment'.
- 2.3.4 In addition to the parallel development process of MTS drafting and IIA assessment of policies and proposals, there are three principal means by which the IIA Report has been taken into account in developing the MTS, these being:
- The IIA Report (incorporating the SEA Environmental Report) and the Draft Revised MTS were subject to consultation with the SEA statutory consultees (Natural England, English Heritage and the Environment Agency) and wider stakeholders and the public. Their responses to consultation were informed by the IIA Report and have been taken into account in determining the content of the MTS, as explained in Chapter 3.
 - As set out in Chapter 3, statutory and other consultees expressed specific views on the IIA Report and the Draft Revised MTS, including comments on enhancement and mitigation. The recommendations for enhancement and mitigation are being taken into account by TfL in the implementation and delivery of the policies and proposals contained in the MTS.
 - Additionally, suggestions for additional monitoring in line with the monitoring indicators listed in the MTS were set out in the IIA Report. How these suggestions have been addressed in finalising the MTS is set out in Chapter 5.



3 Opinions Expressed in Response to Consultation & How These Have Been Taken Into Account

In accordance with Regulation 16.4 (c), this Chapter summarises the opinions received through consultation on the IIA and Draft Revised MTS, and explains how these opinions were taken into account in determining the content of the MTS.

3.1 Overview of Consultation Responses on the Draft Revised MTS

- 3.1.1 TfL has prepared a Report to the Mayor (RTM) on the public and stakeholder consultation on the Draft Revised MTS, which was published alongside the MTS.
- 3.1.2 Chapter 3 of the RTM summarises the opinions expressed in responses to consultation on the Draft Revised MTS categorised under 45 headings, with TfL's recommendations for changes to the MTS considered appropriate having regard to matters raised in the responses received. Chapter 4 of the RTM describes wider changes to the Draft Revised MTS, including updates to reflect other strategies and policy developments. These changes have been accepted by the Mayor.
- 3.1.3 The RTM includes consideration of the issues raised by the Environment Agency, English Nature and English Heritage on the Draft Revised MTS. The results of consultation and the opinions expressed on the IIA Report are set out below, along with the actions TfL has taken in response.

3.2 Overview of Consultation Responses on the IIA Report

- 3.2.1 The SEA Regulations required that the 'consultation bodies' for SEA (the Environment Agency, English Nature and English Heritage) were consulted along with public consultees, on the Draft Revised MTS and the IIA Report, incorporating the Environmental Report.
- 3.2.2 The sections below set out the opinions expressed by the three statutory consultee bodies on the IIA Report, and those of other respondents which analysis showed made comments on the IIA Report or its content and findings. The opinions were received from the following bodies and are summarised below along with relevant actions taken:
 - Environment Agency
 - Natural England
 - English Heritage
 - Inclusion London
 - Friends of the Earth
 - ClientEarth
 - London Sustainable Development Commission



3.3 Environment Agency

- 3.3.1 **Issue:** IIA findings. **Comment:** Supports the finding of the assessment which states that the Draft Revised MTS has set out a strong vision for progressing sustainable transport planning and operation in London. **Action:** Noted. No changes required.
- 3.3.2 **Issue:** IIA findings. **Comment:** Agrees that implementation of MTS is central to efficacy of the MTS vision and agrees with the recommendation that integrated delivery and integrated policy development is critical. **Action:** Noted. No changes required.
- 3.3.3 **Issue:** Miscellaneous. **Action:** Supports conclusion and recommended mitigation measures in Chapter 7. **Action:** Noted. No changes required.

3.4 Natural England

- 3.4.1 No comments were received on the IIA Report. The consultation responses were made in respect of the HRA Screening Report and are summarised below.
- 3.4.2 **Issue:** HRA Screening Report. **Comment:** Natural England (NE) asked for clarifications concerning the role of the LP and MTS, and the deferral of any subsequent assessment to lower tier plans. **Action:** A meeting with NE was held and further correspondence undertaken providing the requested further detail. It was agreed by NE that the HRA Screening Report was compliant with the Habitats Regulations. TfL affirmed in correspondence the position sought by NE that due consideration would be given to the requirements of the Habitats Regulations, that a HRA screening assessment should be undertaken and that, if necessary, Appropriate Assessment (AA) should be undertaken at the level of these lower tier plans by the respective competent authorities. NE has confirmed that it was satisfied with the correspondence and that it provided the necessary further detail requested. NE also confirmed that they agreed with the conclusions of the HRA screening that AA was not required to be undertaken of the MTS. No policy changes made.

3.5 English Heritage

- 3.5.1 **Issue:** IIA Framework. **Comment:** English Heritage (EH) indicated its view that the opportunity to enhance (as opposed to just protect) the historic environment needed to be more fully addressed through the key questions of the assessment framework. **Action:** The assessment framework makes clear that there are opportunities for enhancement to the historic environment, as well as protection. The protection and enhancement of the historic environment are at the core of the assessment framework. Objective F of the IIA assessment framework has as its aim 'to protect and enhance the physical, historic, archaeological and socio-cultural environment and public realm'. No changes made.
- 3.5.2 **Issue:** IIA Framework. **Comment:** With respect to Objective F, Part 3 of the assessment framework, it was considered by EH that the MTS should seek to enhance the designated and non-designated historic environment as well as protect it. **Action:** Under Objective F of the assessment framework used in the IIA, there is a reference 'to protecting designated and non-designated key historic, archaeological and cultural features or assets of value through inclusive design and management'. Whilst there is not a reference to enhancement, it is to be noted that enhancement, as well as protection, is very much at the core of the assessment of the historic environment in the

3 Opinions Expressed in Response to Consultation & How These Have Been Taken Into Account

IIA. The reference to which EH referred, is set out in the assessment framework under sub-objective F.3 which has the aim 'to protect and enhance the historic, archaeological and cultural environment through planning and operations'. Sub-objective F.3 is part of Objective F which has as its aim 'to protect and enhance the physical, historic, archaeological and socio-cultural environment and public realm'. Overall, in considering the effects of the MTS on the historic environment, designated or otherwise, it was concluded that the focus is on enhancement as well as protection; and that the MTS contains a proposal (proposal 83) which will involve the Mayor, through TfL, working with the London boroughs and other stakeholders, and using the principles of 'better streets' to enhance and protect the built and historic environment. No policy changes made.

- 3.5.3 **Issue:** IIA findings. **Comment:** EH considered that the analysis in the MTS focused on spatial elements and did not fully recognise buildings used for transport functions such as stations as being heritage assets. **Action:** It was considered that the assessment framework, set out in Appendix D of the IIA Report (page D45) recognised that stations may be heritage assets, stating that 'The Draft Revised MTS specifically refers to the importance of local historic and cultural context in relation to its 'better streets' approach for the built environment and streetscape. (See Proposal 82 and Section 5.17.2 of the Draft Revised MTS¹¹). The policies and proposals described in relation to the built environment and streetscape IIA objective would be expected to contribute to protecting and enhancing the setting of historic buildings and monuments in London, some of which are stations themselves.' No policy changes made.
- 3.5.4 **Issue:** IIA findings. **Comment:** EH stated the importance of a balanced approach between the need for climate adaptation measures and the need to protect and enhance the historic environment; and noted that care needed to be given to the introduction of adaptation measures within the historic environment, as insensitive design solutions could adversely affect the special character and appearance of heritage assets. **Action:** This was noted and it was concluded that this would be taken into account in the SEA type appraisals which TfL will undertake to inform the development of the Sub Regional Transport Plans. No policy changes made.
- 3.5.5 **Issue:** Monitoring. **Comment:** EH suggested an extra indicator with respect to heritage assets at risk, namely to reduce the proportion of heritage assets at risk as a percentage of the total number of heritage assets in London. **Action:** TfL's view was that, the remit of the MTS is to seek to protect and enhance the historic environment within the bounds of transport planning and not to provide a policy basis for addressing the remediation of heritage assets at risk and that it was therefore inappropriate to include such an indicator in the strategy. No policy changes made.

3.6 Inclusion London/Friends of the Earth

- 3.6.1 **Issue** EqIA. **Comment:** Inclusion London requested that the EqIA of the Draft Revised MTS was published. **Action:** TfL contacted Inclusion London to advise the EqIA had been published as part of the IIA and where it could be accessed.
- 3.6.2 **Issue:** IIA findings. **Comment:** Friends of the Earth provided a joint response on the Draft Revised LP and Draft Revised MTS. The joint response raised queries in regard to specific sections of the IIA of the Draft LP, which did not appear to have application to the IIA of the MTS. **Action:** Clarification

¹¹ Proposal 82 of the Draft Revised MTS is renumbered as Proposal 83 in the Revised MTS.

3 Opinions Expressed in Response to Consultation & How These Have Been Taken Into Account

on this was sought by TfL but no further response was received from Friends of the Earth. No policy changes made.

3.7 ClientEarth

3.7.1 **Issue:** IIA findings. **General Comment:** ClientEarth asserted that the IIA was non-compliant with the SEA Regulations based on the following principal points:

- **Specific Comment 1:** 'Any meaningful assessment of the health impacts of the MTS must include a quantitative analysis of the health risks associated with prolonging non-compliance with limit values in Greater London'.
- **Specific Comment 2:** The IIA findings in relation to health and wellbeing and equality are not accepted as they 'do not take into account the disproportionate impact that poor air quality has on economically disadvantaged communities'.
- **Specific Comment 3:** 'The failure to adequately address the health impacts of air pollution is particularly relevant to the supplementary reports on the removal of the Western Extension Zone (WEZ) and postponement of Phase 3 of the Low Emission Zone (LEZ)'.

3.7.2 **General Action:** The IIA (Scoping Report and Chapters 4 & 6 of the IIA Report) recognises the scale and urgency of the air quality challenge in regard to transport in London and the important role this assumes in terms of the health and wellbeing of Londoners. This has been explicitly identified in the scoping, assessment and reporting stages of the IIA, as a key sustainability challenge facing London and the Mayor.

3.7.3 The IIA Report (Chapters 6 & 7, Appendix D) recognises that the primary strategic framework for reducing emissions and delivering air quality which meets European standards and NO₂ and PM₁₀ and other limit values is the Mayor's Air Quality Strategy (MAQS), which at the time of IIA Report publication was under review and at its first stage of drafting (Assembly & Functional Body draft) with a public draft to come.

3.7.4 Given the differing timeframes within which the Draft Revised MTS and the Draft Revised MAQS were being produced, the IIA team reviewed the policies and proposals contained within the transport section of the emerging Assembly & Functional Body Draft Revised MAQS, including the removal of WEZ and deferral of LEZ Phase 3.

3.7.5 The IIA Report (Chapter 6 & 7) noted the importance of ensuring that policies and proposals within the Draft Revised MTS were considered within the context of the broader suite of policies and proposals contained in the Draft Revised MAQS.

3.7.6 **Action on Specific Comment 1.** There is no requirement in the SEA Regulations that assessment of environmental or health effects must be quantitative. The Practical Guide to SEA Directive advises that in practice SEA needs to be adapted to the nature of the plan, in this case the MTS. The guidance indicates that predictions of effects do not have to be expressed in quantitative terms and that qualitative predictions can be equally valid. Having regard to the nature of the plan being a transport strategy and the emergent stage of the MAQS, which is the Mayor's principal strategy for tackling air quality in Greater London, the assessment undertaken in the IIA of air



3 Opinions Expressed in Response to Consultation & How These Have Been Taken Into Account

quality impacts was principally qualitative but took account of available quantitative air quality data.

- 3.7.7 The IIA Report reported TfL estimates of the percentage reductions in NO₂ and PM₁₀, as a consequence of measures in the Draft Revised MTS and the transport section of the emerging Functional Bodies Draft MAQS¹². As explained in Appendix D (Assessment Framework) of the IIA Report (page D33), the policies and proposals in the Draft Revised MTS relating to air quality are aimed at reducing emissions and thereby improving air quality. The IIA Report explains that reductions in concentrations of transport related pollutants will result in health benefits for the population experiencing the reductions in exposure, as measured by outcomes including shortening of life and hospital admissions.
- 3.7.8 The IIA Report (Appendix D, page D34) also clearly acknowledges that the timing of measures to reduce transport related air pollution is a significant factor, within the context of targets to meet EU air quality standards. The IIA notes that the problem is most acute for PM₁₀ in parts of central London, while NO₂ concentrations are anticipated to exceed the limit value near major roads across Greater London. The impetus for the measures necessary to achieve compliance with limit values will come principally from the MAQS. The conclusion of the IIA Report on health and well-being is that there will be an overall positive outcome as a consequence of the MTS, taking into account reductions in emissions and a wide range of other factors such as reduced noise, increased levels of physical exercise and the promotion of regeneration through improving streetscapes and transport links. No policy changes or action required.
- 3.7.9 **Action on Specific Comment 2:** The IIA of the Draft Revised MAQS provides the appropriate context within which detailed and quantitative assessment of the impacts of air quality on the health and wellbeing of disadvantaged sections of the community will take place. No policy changes or other action required.
- 3.7.10 **Action on Specific Comment 3:** As ClientEarth noted in their consultation response letter, the MAQS is the principal document for tackling air quality and it is considered reasonable for the MTS IIA Report to refer to the MAQS with respect to mitigation of poor air quality in Greater London. The revisions to the MAQS have been further developed since the preparation of the Draft Revised MTS and now set out further information on how improvements in air quality will be delivered across London, including consideration of the proposals on the removal of WEZ and deferral of Phase 3 of LEZ. The Draft MAQS is subject to public consultation. No policy changes or action required.
- 3.7.11 The proposals to remove WEZ and defer Phase 3 of LEZ will be subject to further assessment and consultation as part of the Variation Order process, in which there will be the opportunity to take into account the latest available analysis on air quality, including the IIA of the Draft Revised MAQS.

3.8 London Sustainable Development Commission

- 3.8.1 **Issue:** IIA process. **Comment:** Welcomes the approach taken to IIA and notes the findings that the Strategy will contribute to the sustainability of London. **Action:** Noted.

¹² Noting that the MTS provides updated information on emission reductions.

4 Reasons for Choosing the MTS as Adopted in the Light of Other Reasonable Alternatives Dealt With

In accordance with Regulation 16.4 (e), this Chapter summarises the alternatives considered in developing the MTS and the reasons for choosing the MTS in its adopted form in light of these alternatives.

4.1 Development of the Revised MTS: Strategy Alternatives Considered

- 4.1.1 During the course of the development of the Revised MTS, the drafting team together with the drafting teams for the Revised LP and Revised EDS examined strategic options exploring alternative spatial patterns of development within London and the impacts on key outcomes identified by the respective strategies. With regard to the Draft Revised MTS this involved assessing the impacts of alternative patterns of spatial development in terms of key transport outcomes.
- 4.1.2 Three strategic transport policy options or alternatives (hereafter referred to as “Options”) were put forward for the Draft Revised MTS, with the aim of identifying how best to structure and deliver sustainable transport within London in the period to 2031. These options are detailed within the IIA Report (Chapter 2).
- 4.1.3 The three Options assessed were as follows:
- Option 1: The ‘Do Minimum’ option. This followed the current London Plan approach to spatial and land use planning. Option 1 was based on the current MTS and included committed transport investment; that is TfL investment as set out in the current TfL Business Plan to 2017/18 and the rail investment set out in the Government’s railway investment programme (HLOS) up to 2014¹³.
 - Option 2: This Option was also based on the current London Plan approach to spatial and land use planning, but extended the timeframe to 2026 and incorporated the drafting of revised MTS policies and proposals broadly in line with this pattern of development¹⁴.
 - Option 3: This Option used an approach to spatial planning and land use development involving greater emphasis on decentralised development, including strategic intervention in Outer London Development Centres; together with the drafting of revised MTS policies and proposals broadly in line with this pattern of development within a timeframe up to 2026.
- 4.1.4 As part of the IIA Report (Chapter 6 and Appendix D), the sustainability performance of these options was reported. Consideration of their respective merits input into the identification of the Preferred Option, the Revised MTS.

¹³ Includes retention of the WEZ within the congestion charging zone and the continued implementation of the LEZ (including Phase 3 in October 2010).

¹⁴ The time horizon for modelling at that time was 2026 and this was used to provide evidence on the comparative performance of the options. Subsequent analysis has taken into account more recent projections of population and employment for 2031 and these were used in the assessment of the preferred option.

4.2 Reasons for Adoption of the MTS

- 4.2.1 Option 1 was discarded as not addressing the likely transport needs of Greater London generated by growth in population and employment over the period to 2026.
- 4.2.2 The results of the modelling by TfL of the two other Options demonstrated little difference in the outcomes at a strategic or London-wide level. Disaggregating the data to the sub-regional and local level, however, highlighted subtleties of impact which were not discernable at the London-wide level. Under Option 3, trip lengths were reduced overall and central London enjoyed a reduction in congestion and crowding; but highway congestion increased by up to 10 per cent in town centres where job growth was forecast.
- 4.2.3 This increase in congestion was particularly acute around the Outer London Development Centres. The negative impacts of congestion on the physical environment, human health, journey reliability and facilitating economic development, amongst other matters, were highlighted.
- 4.2.4 Of wider consideration, were the preliminary findings of the Outer London Commission and the emergent strategic policy approach being adopted by the Draft Revised LP. A clear steer was provided for the need for strategic policy consistency across Mayoral strategies and integration of spatial and land use planning with transport. Consistency was considered to be facilitated through a continuing focus on sustainable employment growth directed to central and Inner London but with enhancement of employment opportunities and transport capacity within Outer London, in line with identified need.
- 4.2.5 This policy approach broadly favoured the selection of Option 2 over Option 3. It was recognised, however, that refinements of Option 2 would be appropriate, to maximise the benefits of what could be achieved, including promoting economic development opportunities in Outer London. This formed the basis of the subsequent development of the Preferred Option, now the Revised MTS.
- 4.2.6 Following the consultation on the Draft Revised MTS, the MTS has been refined to take into account the findings of the consultation exercise. The full detail of changes made to the MTS are set out in the RTM, as discussed in Chapter 3.

5 The Measures That Are To Be Taken to Monitor the Significant Environmental and Wider Sustainability Effects of the Implementation of the MTS

In accordance with Regulation 16.4 (f) and Regulation 17, this Chapter summarises the monitoring measures that will be undertaken by TfL to monitor the significant environmental and wider sustainability effects of the implementation of the MTS.

5.1 Summary of Monitoring

- 5.1.1 Monitoring is the mechanism used to ensure that the implementation of policies and proposals is consistent with the sustainability aspirations of the Strategy. The SEA Regulations state that monitoring must be undertaken of the likely significant environmental effects of the implementation of plans and programmes in order to identify at an early stage any unforeseen effects and be able to undertake appropriate remedial measures.
- 5.1.2 The primary responsibility for undertaking monitoring of the delivery of the MTS resides with TfL. TfL has established monitoring capacity which will be applied to addressing the needs of reviewing the implementation of the MTS across all aspects of sustainability and not just environmental sustainability, as set out in Chapter 9 of the Revised MTS. This will comprise a framework of indicators, as set out in Figure 90 of Chapter 9 of the MTS.
- 5.1.3 The IIA Report identified additional monitoring for consideration where these were not specifically identified in the monitoring proposed in the Draft Revised MTS. These included issues of accessibility and mobility, road and public transport safety, resource use and monitoring. TfL has considered these and takes the view that, broadly, they are covered through existing monitoring and reporting procedures, principally set out in the Travel in London Report (the 2010 Report can be located at <http://www.tfl.gov.uk/corporate/about-tfl/publications/1482.aspx>) and annual TfL Environment Report (located at <http://www.tfl.gov.uk/corporate/about-tfl/publications/1478.aspx>).
- 5.1.4 Chapter 9 of the MTS, as adopted, sets out the specific measures which will be used to monitor the likely significant effects of the implementation of the Strategy.

